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February 25, 2021

Hon. Alvin K. Hellerstein, USDJ
US Courthouse, SDNY
500 Pearl St.
New York, NY 10007-1312

So ordered,
/s/ Alvin K. Hellerstein
Alvin K. Hellerstein
2/26/21

Re: Sholem Weisner v. Google LLC, et al (SDNY 1:20-cv-02862)

Dear Judge Hellerstein:

I represent Plaintiff Weisner in the above matter.

I write to respectfully request a 31 day extension through/including April 13, 2021 to file Plaintiff's Opposition to Defendant Google's Motion to Dismiss Plaintiff' Second Amended Complaint filed on February 19, 2021 (ECF #s 75 through 77; 77-1 through 77-2)(“Google's Motion”). Google's current Reply date is March 12, 2021.

As per 1D of your Individual Practices: (i) The Original Date (i.e. last day) to file Plaintiff's Opposition to Google's Motion is March 5, 2021 (SDNY LR Rule 6.1(b)); (ii-iii) There has been no prior Plaintiff extension request; (iv) Adversary Counsel for Defendant Google has consented to the requested 31 day extension through/including April 13, 2021, provided Plaintiff consents, and Plaintiff does consent, to an extension for Google's Reply to through/including May 4, 2021 (v) No prior date has previously been scheduled after the Original Date.

I am a sole practitioner, and am seeking a first time adjournment to file Plaintiff's Opposition to Google's Motion due to: a) The press of other litigated matters, b) The Passover holidays from March 27 through April 4, 2021 when Plaintiff and his Counsel do not work due to their religious requirements; c) Exclusive of the Passover holidays, Plaintiff is therefore requesting a total of 31 days of extension from March 5, 2021 the current response date; d) With the exercise of reasonable diligence I have been unable to prepare Plaintiff's Opposition to Google's Motion and am therefore requesting (exclusive of the Passover holidays) a 31 day extension of time to do so.

Therefore, good cause appearing, I respectfully request an extension of 31 days through/including April 13, 2021 to file/serve Plaintiff's Opposition to Google's Motion; a 14 day extension for Google's Reply through/including May 4, 2021.

Respectfully submitted,
/s/ Jacob Ginsburg
Jacob Ginsburg, Esq.

cc:
Counsel for Defendant Google via ECF
Involuntary Plaintiff Nemanov via email